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*Attorneys for Defendant Meta Platforms, Inc.*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
Corporation headquartered in California,

Defendant.

Case No. 3:20-cv-08570-JD

**DEFENDANT'S RESPONSE TO  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED (CIVIL L. R. 79-  
5(f))**

Judge: Hon. James Donato

**STANDING ORDER PARAGRAPH 31 NOTICE**

The parties have agreed to use the approach outlined in Paragraph 31 of the Court's Standing Order for Civil Cases for the round of briefing associated with Defendant Meta Platforms, Inc.'s Motion to Dismiss the First Amended Consolidated Advertiser Class Action Complaint ("FAC"). Meta previously notified the Court that it planned to file a combined Administrative Motion to Seal when its Motion to Dismiss briefing is complete, and hereby notifies the Court that its combined Administrative Motion to Seal will address the material redacted in Advertiser Plaintiffs' Opposition to Meta's Motion to Dismiss the First Amended Complaint (Dkt. 271).

**META'S RESPONSE TO PLAINTIFFS' ADMINISTRATIVE MOTION**

Pursuant to Civil Local Rule 79-5(f)(3) and Paragraph 31 of the Court's Standing Order for Civil Cases, Defendant Meta Platforms, Inc. files this Response to Plaintiffs' Administrative Motion, Dkt. 270, to consider whether portions of the Advertisers' Opposition to Meta's Motion to Dismiss the FAC, Dkt. 271, should remain under seal.

As set forth below, Meta only seeks to seal portions of Advertisers' Opposition that reference non-public information contained in the FAC concerning the specific terms of contracts with business counterparties that Meta has designated as "Confidential" or "Highly Confidential" under the Stipulated Protective Order, Dkt. 111, and that, if revealed to Meta's competitors or potential counterparties, could cause competitive harm to Meta, *see* Khurana Decl. ¶¶ 7, 8, Dkt. 244-1. Accordingly, Meta requests that the Court enter an order sealing the information identified in the table below:

<b>Document</b>	<b>Portions to be filed Under Seal</b>	<b>Party Claiming Confidentiality</b>
Advertiser Plaintiffs' Opposition to Meta's Motion to Dismiss the First Amended Consolidated Advertiser Class Action Complaint	Highlighted portion of lines 10-12 at page 5; lines 16-18 at page 6; and lines 21-24 at page 12.	Defendant

Included with this Motion (and filed under seal) is an unredacted version of Advertisers'

1 Opposition, highlighting the information that Meta requests remain under seal in orange (Meta  
 2 does not seek to maintain the yellow-highlighted material under seal). Meta has also attached a  
 3 public version of Advertisers' Opposition that redacts the material Meta requests remain under  
 4 seal.

5 As noted, upon conclusion of briefing on Meta's Motion to Dismiss, the parties will submit  
 6 a combined Administrative Motion to Seal addressing the excerpts identified above, as well as any  
 7 other portions of the Motion to Dismiss briefing that contain Meta's confidential information and  
 8 that Meta seeks to maintain under seal.

9 Dated: April 18, 2022

Respectfully submitted,

10 By: /s/ Molly Jennings

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